

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America

v.

DANTE FORD

Case No.

Mag. No. 24-mj-7080 (EAP)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 2022 through June 2024 in the county of Camden, Gloucester, Cumberland, and Atlantic in the District of New Jersey, the defendant(s) violated:

Code Section

18 U.S.C. § 1349, contrary to 18 U.S.C. § 1344

See Attachment A.

Description of Offenses

This criminal complaint is based on these facts:

See Attachment B.

☒ Continued on the attached sheet.

/s/

Samuel A. Bracken

Complainant's signature

Samuel A. Bracken, U.S. Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

telephone (specify reliable electronic means):

Date: 08/05/2024

City and state: Camden, New Jersey

Hon. Elizabeth A. Pascal, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED
UNITED STATES ATTORNEY

By: /s/Jeffrey B. Bender
Jeffrey B. Bender, Assistant U.S. Attorney

Date: August 5, 2024

ATTACHMENT A

COUNT ONE

(Conspiracy to Commit Bank Fraud)

From in or around June 2022 through in or around June 2024, in Camden, Gloucester, Cumberland, and Atlantic Counties, in the District of New Jersey and elsewhere, the defendants,

TRACY FELDER-CARTER,
DANTE FORD,
QUAMELL KEYES-GRIFFIN,
and
DONOVAN BUNCH,

did knowingly and intentionally conspire and agree with each other and others to execute and attempt to execute a scheme and artifice to defraud a financial institution and to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344, as described in Attachment B.

In violation of Title 18, United States Code, Section 1349.

ATTACHMENT B

I, Samuel A. Bracken, am an Inspector with the United States Postal Inspection Service. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, photographs, and recordings of the evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date and time, I am asserting that it took place on or about the date and time alleged.

Background

1. During the times relevant to this complaint:
 - a. Tracy Felder-Carter ("Felder-Carter") was a resident of Blackwood, New Jersey.
 - b. Dante Ford ("Ford") was a resident of Pennsauken, New Jersey, and Sewell, New Jersey.
 - c. Quamell Keyes-Griffin ("Keyes-Griffin") and Donovan Bunch ("Bunch") were residents of the same house in Sicklerville, New Jersey.
2. Based on my training, experience, and knowledge of the investigation, including the facts as set forth in this affidavit, there is probable cause to believe that between approximately June 2022 and June 2024, in the District of New Jersey and elsewhere, Felder-Carter, Ford, Keyes-Griffin, and Bunch conspired and agreed with each other and others to defraud financial institutions¹ by negotiating and causing to be negotiated altered or counterfeit versions of checks that had been stolen from the U.S. mail.
3. Although the manner and means by which the conspiracy operated varied, the conspiracy generally operated as follows:
 - a. Somebody would steal checks from the U.S. mail. Some of the checks were stolen by people unaffiliated with the U.S. Postal Service who used unlawfully obtained "arrow keys" to access blue

¹ Based on my training and experience, I am aware that Bank of America, TD Bank, and Republic Bank are insured by the Federal Deposit Insurance Act and that accounts at Navy Federal Credit Union ("NFCU") are insured by the National Credit Union Share Insurance Fund.

U.S. mail collection boxes. Other checks were stolen by one or more corrupt U.S. postal workers who stole mail while employed by the U.S. Postal Service.

- b. Many of the stolen checks were altered by members of the conspiracy.² The alterations included increasing the face value of the check and changing the name of the payee on the check to either a member of the conspiracy or somebody recruited by a member of the conspiracy who had agreed to permit the conspiracy to use that individual's bank account to negotiate checks ("Account Holder").
- c. A member of the conspiracy or the Account Holder would negotiate the altered check and attempt to withdraw the funds before the financial institution learned that the check was illegitimate. The conspiracy involved the negotiation of hundreds of altered checks.

4. Examples of some of the transactions involving Felder-Carter, Ford, Keyes-Griffin, and Bunch are set forth herein. As part of the investigation, Postal Inspectors executed federal search warrants at the residences of Felder-Carter, Ford, Keyes-Griffin, and Bunch, and seized, among other evidence, their cellphones. The text conversations set forth herein were obtained from the forensic extractions of the seized cellphones.

Depositing Fraudulent Checks into Bank of America Account Ending x2938

5. On or about September 16, 2022, Bank of America account ending x2938 was opened in the name of Account Holder 1.

6. On October 8, 2022, Felder-Carter and Bunch engaged in the following text conversation recovered from Felder-Carter's phone. The phone number with which Felder-Carter was communicating is identified in his cellphone as "don" and matches the phone number on the cellphone seized from Bunch.

Felder-Carter:	Send me name addy 30
Bunch:	[Victim 1]
	[Victim 2]
	[street address redacted], Philadelphia, Pa 19145
	?
Felder-Carter:	Waiting
Bunch:	Bet
Felder-Carter:	[sends BUNCH a screenshot of a Telegram chat in which the same names and address were sent and a

² Other stolen checks were advertised for sale on social media platforms.

message in response provided the date of birth and Social Security number for Victim 2.]

...

Bunch: [Victim 3]
[street address redacted]
Philadelphia, Pa 19146
Another 30?

Felder-Carter: Yea

Bunch: Sent
?

Felder-Carter: [sends Bunch a screenshot of a Telegram chat in which the same name and address were sent and a message in response provided the date of birth and Social Security number for Victim 3.]

7. Based on my training, experience, and knowledge of the investigation, I believe the above conversation reflects Bunch sending to Felder-Carter the names and addresses of Victims 1, 2, and 3 and Felder-Carter obtaining and selling to Bunch for \$30 additional means of identification for the same three Victims.

8. Bank of America records for account ending x2938 in the name of Account Holder 1 show a deposit of the following two checks at a Bank of America ATM in Cherry Hill, New Jersey, on October 10, 2022:

- a. Check number 1011 for \$2,400 written from Victim 1 and 2's Citizen's bank account.
- b. Check number 946 for \$800 written from Victim 3's American Heritage bank account.

Bank surveillance photographs of these deposits show that the vehicle used to deposit the checks was registered to D.K. at the address at which Keyes-Griffin and Bunch resided in Sicklerville, New Jersey.

9. Bank of America records show that an \$8,000.23 check written from Victim 4's WSFS bank account was deposited on October 17, 2022 into the same account ending x2938 at a Bank of America ATM in Absecon, New Jersey.

10. On October 18, 2022, Bunch messaged Felder-Carter "Go pull dat 800 / For me" and sent a screenshot of the recent transaction history of what appears to be account ending x2938.

11. Bank of America records show that on October 18, 2022, \$800 was withdrawn from account ending x2938 via an ATM withdrawal in Clementon, New

Jersey. The car used to conduct the withdrawal was a silver Dodge Charger with license plate Z76-RGL ("Dodge Charger").

12. On December 1, 2022, Pennsylvania State Police troopers stopped the Dodge Charger for motor vehicle violations. Felder-Carter was driving the Dodge Charger and Keyes-Griffin was the passenger. Officers obtained a state search warrant to search the Dodge Charger and recovered a firearm, two USPS arrow keys that open blue U.S. mail collection boxes, two trash bags of mail that appeared to have been taken from blue U.S. mail collection boxes, and eleven debit/credit cards in the names of third parties, including a debit card in the name of Account Holder 1.

Additional Fraud Against Bank of America Linked to December 1, 2022 Debit Cards

13. Two Bank of America debit cards were recovered from the Dodge Charger on December 1, 2022, in addition to the Bank of America debit card for Account Holder 1. Felder-Carter and Keyes-Griffin engaged in fraudulent activity involving accounts linked to both debit cards, described herein as accounts belonging to Account Holders 2 and 3.

14. On July 3, 2022, Account Holder 2 opened Bank of America account ending x3685.

- a. On September 20, 2022, an individual matching the physical appearance of Keyes-Griffin, and driving the Dodge Charger, deposited a fraudulent check in the amount of \$7,900.71 into Account Holder 2's account at a Bank of America ATM in Somers Point, New Jersey. Notably, location information from Felder-Carter's cellphone indicated that it was present in the vicinity of this Bank of America ATM at the time of this deposit.

15. On July 5, 2022, Account Holder 3 opened Bank of America account ending x5667 in Deptford, New Jersey.

- a. On July 14, 2022, an individual matching the physical appearance of Keyes-Griffin, and driving the Dodge Charger, deposited five fraudulent checks totaling \$2,179.63 into Account Holder 3's account at a Bank of America ATM in Cherry Hill, New Jersey.
- b. On September 21, 2022, an individual matching the physical appearance of Felder-Carter deposited a fraudulent check in the amount of \$7,000.21 into Account Holder 3's account at a Bank of America ATM in Gloucester, New Jersey.

- c. On October 7, 2022, an unidentified co-conspirator driving the Dodge Charger deposited a fraudulent check in the amount of \$7,475 into Account Holder 3's account at a Bank of America ATM in Vineland, New Jersey. An individual matching the physical appearance of Felder-Carter was in the front passenger seat of the Dodge Charger during this transaction.

Defrauding Republic Bank Using Counterfeit TD Bank Checks

16. On November 25, 2022, Keyes-Griffin and Felder-Carter exchanged the following messages recovered from Felder-Carter's phone. The phone number with which Felder-Carter was communicating is identified in his cellphone as "Qua," subscribed to Keyes-Griffin, and is the phone number Keyes-Griffin used to open up the Republic Bank account two days later, *see infra*:

Keyes-Griffin:	Yo Monday I'm opening up a oa, shitt hard asl to get a piece so I just gotta open ma own shitt at dis point
Felder-Carter:	Look this [sends photograph of a Republic Bank receipt for a \$7,500 deposit made the same day] Back ["Loved" Keyes-Griffin's message beginning "Yo Monday . . ."]
Keyes-Griffin:	Repub back [bank]
Felder-Carter:	Yessir
Keyes-Griffin:	Aww man snm [say no more]

17. Based on my training, experience, and knowledge of the investigation, I believe the above conversation reflects Keyes-Griffin indicating that he was going to open a new bank account in his own name to expand his role in the bank fraud conspiracy, and Felder-Carter recommended that Keyes-Griffin open an account at Republic Bank. My belief is based, in part, on other messages exchanged by Keyes-Griffin and Felder-Carter, including the following message sent by Keyes-Griffin to Felder-Carter on November 15, 2022, in which Keyes-Griffin is seeking to buy a fraudulent check and Felder-Carter's response that Felder-Carter would sell a fraudulent check to Keyes-Griffin for 5 bills, meaning \$500: "Yo hm will u charge me if I brought a slip off u? Bc bran not tryin throw me his piece bc he know I'm goin through u and he not tryin split it 3 ways he bms not tryin throw it."

18. On November 27, 2022, Keyes-Griffin opened checking account ending x5371 at the Republic Bank branch in Sicklerville, New Jersey. The same day, Keyes-Griffin sent a message to Felder-Carter: "O rd nights at the bank now u can cashapp me 10 for the deposit?"

19. On November 28, 2022, Felder-Carter and Ford engaged in the following text conversation between 10:47 a.m. and 2:27 p.m., as recovered from Felder-Carter's phone. The phone number with which Felder-Carter was communicating is identified in Felder-Carter's cellphone as "Billy," is subscribed to the mother of Ford's children, was used as the phone number on Ford's Apple Pay Cash accounts.³

Felder-Carter: Yo need two cashier Rey send names
 Ford: Send names
 Felder-Carter: [Account Holder 4]
 Felder-Carter: Quamell keyes-griffin
 ...
 Ford: Wanna meet at deptford mall?
 Felder-Carter: Yea
 Ford: Ima do 6500 each they both fresh?
 Felder-Carter: Bet
 Ford: Just give me a dollar off each DONT even trip
 Ford: Idk why it sent caps lmao
 Felder-Carter: Wats dollar ?
 Ford: 1k
 Felder-Carter: So 2k
 Ford: Well yea lmao
 Ford: Off ends tho obviously
 ...
 Felder-Carter: Wya
 Ford: Wya I'm up here
 Ford: Red Robin
 Felder-Carter: Bet
 Felder-Carter: Pulling in
 Ford: Go run ya movie ima meet you soon as you done
 Felder-Carter: Rd

20. Based on my training, experience, and knowledge of the investigation, I believe the above conversation reflects Felder-Carter asking Ford to purchase two counterfeit cashier's checks, each in the amount of \$6,500, that Ford would create in the names of Keyes-Griffin and Account Holder 4. Felder-Carter agreed to pay Ford \$1,000 per each fraudulent cashier's check that was successfully negotiated ("off ends").

21. Meanwhile, at approximately 2:25 p.m., Felder-Carter messaged Keyes-Griffin a screenshot of a message containing a Republic Bank verification

³ In further support of my belief that Felder-Carter was communicating with Ford, on June 29, 2023, the same cellphone sent Felder-Carter a picture of an invitation to celebrate "Dante's 27th Birthday" on July 15, 2023 at the Sewell address at which Ford resided, which is within a few days of Ford's 27th birthday.

code that an individual would use to verify their authorization to access the account.

22. Two hours later the same day—at 4:35 p.m.—Felder-Carter sent via text message to Ford photographs of two Republic Bank deposit slips showing the deposit of a \$6,700 check in account ending x5371 and the deposit of a \$6,500 check into account ending x5366.

23. Republic Bank records for account ending x5371 in the name of Keyes-Griffin show a deposit on November 28, 2022 of Fifth Third Bank cashier's check #36693271 in the amount of \$6,700.00 at the Republic Bank located in Media, Pennsylvania.

24. Republic Bank records for account x5366 in the name of Account Holder 4, which—like Keyes-Griffin's account—was opened on November 27, 2022, show a deposit on November 28, 2022 of Fifth Third Bank cashier's check #36693270 in the amount of \$6,500.00 at the Republic Bank located in Wynnewood, Pennsylvania. The Fifth Third Bank transaction and cost center numbers listed on the check were the same as check #36693271 in the name of Keyes-Griffin, which further shows that they were counterfeited from the same original check.

Depositing Fraudulent Checks into TD Bank Account Ending x9995

25. On November 26, 2022, Felder-Carter and Ford engaged in the following text conversation:

Felder-Carter: [Sends message with name of Account Holder 5, account number ending x9995, street address in Glassboro, New Jersey, and other identifying information.]

Ford: Send dude gram rq
Asap
I'm bout to see what he on
I'm boutta drop too lil twin

Ford: [Sends a photograph to Felder-Carter showing ATM receipt for deposit of six checks totaling \$6,106.25 into TD Bank account ending x9955 at 6:16 p.m. on November 26, 2022 in Sewell, New Jersey]

Ford: Tell head don't login
Don't touch the lil 100

Felder-Carter: I was sleep
Rd
I told em

Ford: Ok bet and send me dude numbe bro

26. Based on my training, experience, and knowledge of the investigation, I believe the above conversation reflects Felder-Carter providing Ford account information and credentials to access a bank account online. At 6:09 p.m., Ford told Felder-Carter that he would soon be depositing checks into the account and sent Felder-Carter a photograph of the slip reflecting that deposit. Ford instructed Felder-Carter to tell the account holder (“head,” which here refers to Account Holder 5) not to access the account (“login”) or withdraw any of the available funds (“don’t touch the lil 100”).

27. TD Bank records show that account x7295 and x9995 are in the name of Account Holder 5. On November 26, 2022—the same day as the conversation set forth above—account x9995 received an ATM deposit of six checks totaling \$6,106.25 at the TD Bank ATM located at 491 Huffville-Cross Keys Road, Sewell, New Jersey. The six checks were later returned as fraudulent. But, before they could be returned, there were multiple withdrawals, debit card purchases, and ATM withdrawals out of account x7295, which caused a loss to TD Bank of \$3,197.92.

Depositing Fraudulent Check into NFCU Account Ending x2697

28. On May 25, 2023, Bunch sent a message with the name and Philadelphia address of Account Holder 6 to an individual identified in Bunch’s phone as “Marky.”

29. Navy Federal Credit Union (“NFCU”) records show that on May 26, 2023, a \$13,509.83 check written from Victim 5’s business bank account at the Bank of Clarendon was deposited into Account Holder 6’s account ending x2697 at NFCU in Cherry Hill, New Jersey. Location information from Bunch’s cellphone indicated that it was present in the vicinity of this NFCU branch within approximately seven minutes of this deposit.

30. On May 26, 2023, Bunch sent a message to “Marky” with a photograph of the NFCU deposit slip showing the deposit of the \$13,509.83 check the same day.

31. NFCU records show various withdrawals and debit card purchases totaling approximately \$12,000 over the subsequent several days, including a \$8,500 cash withdrawal on May 31, 2023 from an NFCU branch in Pennsylvania, before NFCU reversed the check on or about June 1, 2023 as forged or counterfeit.

32. On May 31, 2023, "Marky" and Bunch exchanged the following messages:

"Marky": Send
Bunch: Shit locked
[sends screenshot of notification of message from NFCU
for the first name of Account Holder 6]
He keep getting dese jus called up
Balance
[message not readable]
"Marky": It just locked up
?
Bunch: That's what niggas tryna see rn

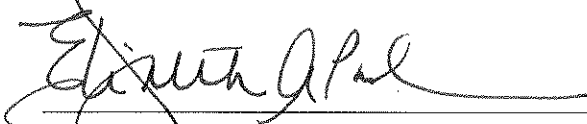
33. When Inspectors executed federal search warrants on July 7, 2023, Inspectors recovered from Bunch's car, among other items, a debit card in the name of Account Holder 6.

Respectfully submitted,

/s/ Samuel A. Bracken

Samuel A. Bracken
Postal Inspector

Pursuant to Fed. R. Crim. P. 4.1, Inspector Bracken was sworn and attested to the contents of this affidavit in support of the criminal complaint.



HON. ELIZABETH A. PASCAL
United States Magistrate Judge

Date: August 5, 2024